

- 1 GUIDO SAVERI (Bar No. 22349)  
guido@saveri.com
- 2 R. ALEXANDER SAVERI (Bar No. 173102)  
rick@saveri.com
- 3 CADIO ZIRPOLI (Bar No. 179108)  
cadio@saveri.com
- 4 SAVERI & SAVERI, INC.  
706 Sansome Street  
5 San Francisco, California 94111  
Telephone: (415) 217-6810  
6 Facsimile: (415) 217-6913
- 7 *Interim Lead Counsel for the*  
8 *Direct Purchaser Plaintiffs Class*
- 9 MARIO N. ALIOTO (Bar No. 56433)  
malieto@tatp.com
- 10 LAUREN C. RUSSELL (Bar No. 241151)  
lauren russell@tatp.com
- 11 TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP  
2280 Union Street  
San Francisco, California 94123  
12 Telephone: (415) 563-7200  
Facsimile: (415) 346-0679
- 13 *Interim Lead Counsel for the*  
14 *Indirect Purchaser Plaintiffs Class*
- 15 James L. McGinnis (Bar No. 95788)  
jmcginnis@sheppardmullin.com
- 16 SHEPPARD MULLIN RICHTER & HAMPTON LLP  
Four Embarcadero Center, 17th Floor  
San Francisco, California 94111  
17 Telephone: (415) 434-9100  
18 Facsimile: (415) 434-3947
- 19 *Defense Liaison Counsel*

20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

22

23 IN RE: CATHODE RAY TUBE (CRT)  
24 ANTITRUST LITIGATION

MASTER FILE NO.. 07-cv-5944 SC

MDL NO. 1917

25 STIPULATION AND ~~PROPOSED~~  
26 ORDER  
27  
28

1 It is hereby stipulated by and between the Direct Purchaser Plaintiffs ("DPPs") and the  
2 Indirect Purchaser Plaintiffs ("IPPs") and the undersigned defendants ("Defendants") in this action  
3 as follows:

4 WHEREAS, on June 29, 2011, the Honorable Samuel Conti ordered upon the  
5 recommendation of the Special Master, Charles A. Legge, that DPPs and IPPs have until  
6 September 1, 2011 to provide a list to Defendants of certain documents produced in the *In Re:*  
7 *TFT-LCD (Flat Panel) Antitrust Litigation, Case No. M07-1827 SI ("In Re: TFT-LCD")* action for  
8 the limited purpose of identifying documents for potential production in this action ("LCD  
9 Document Stipulation" attached hereto as Exhibit A).

10 WHEREAS, DPPs, and IPPs continue to review the LCD document productions for  
11 relevant documents;

12 WHEREAS, the DPPs and IPPs have requested, and the Defendants have agreed to extend  
13 the deadline for the production of the LCD document list an additional forty five days, such that  
14 the list shall now be provided to Defendants on October 17, 2011;

15 WHEREAS, DPPs and IPPs agree to provide the Defendants with the list of documents on  
16 a rolling basis;

17 IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the  
18 undersigned Plaintiffs and Defendants that:

19 The deadline for DPPs and IPPs to serve Defendants with a list of LCD documents  
20 pursuant to the June 29, 2011 LCD Document Stipulation is extended until October 17, 2011.

21  
22 DATED: August 29, 2011

SAVERI & SAVERI, INC.  
GUIDO SAVERI  
R. ALEXANDER SAVERI  
CADIO ZIRPOLI

23  
24  
25 By: /s/ Guido Saveri

26 GUIDO SAVERI  
27 Interim Lead Counsel for the  
28 Direct Purchaser Plaintiffs Class

1 DATED: August 29, 2011

TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP  
MARIO N. ALIOTO

2  
3 By: /s/ Mario N. Alioto

4 MARIO N. ALIOTO  
5 *Interim Lead Counsel for the*  
*Indirect Purchaser Plaintiffs Class*

6 For the Limited Purpose of this Stipulation, Liaison Counsel

7 DATED: August 29, 2011

SHEPPARD MULLIN RICHTER & HAMPTON  
LLP  
JAMES L. MCGINNIS

8  
9 By: /s/ James L. McGinnis

10 JAMES L. MCGINNIS  
11 *Defense Liason Counsel and Counsel for Defendants*  
12 *Samsung SDI America, Inc., Samsung SDI Co., Ltd.,*  
13 *Samsung SDI (Malaysia) Sdn. Bhd., Samsung SDI*  
14 *Mexico S.A. de C.V., Samsung SDI Brasil Ltda.,*  
15 *Shenzhen Samsung SDI Co. Ltd., and Tianjin Samsung*  
16 *SDI Co., Ltd.*

17 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

18 I, Cadio Zirpoli, attest that concurrence in the filing of this document has been obtained  
19 from all signatories. I declare under penalty of perjury under the laws of the United States of  
20 America that the foregoing is true and correct. Executed this 29th day of August 2011, at San  
21 Francisco, California.

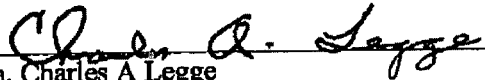
22  
23 /s/ Cadio Zirpoli

1 IT IS SO RECOMMENDED.

2 DATED: August 29, 2011

3

4

  
Hon. Charles A Legge  
Special Master

5

6

IT IS SO ORDERED UPON THE RECOMMENDATION OF THE SPECIAL MASTER.

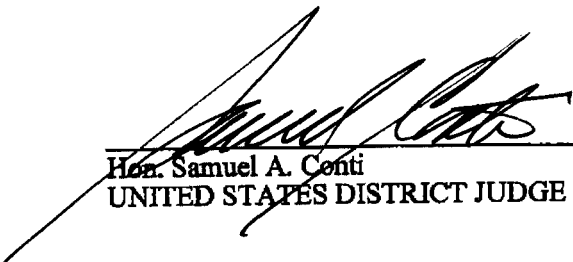
7

DATED: Sept 2  
August 2, 2011

8

9

10

  
Hon. Samuel A. Conti  
UNITED STATES DISTRICT JUDGE

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Crt.454

26

27

28

# **EXHIBIT A**

Case3:07-cv-05944-SC Document938 Filed06/29/11 Page6 of 11

Case3:07-cv-05944-SC Document952 Filed06/29/11 Page1 of 6

Case3:07-cv-05944-SC Document949 Filed06/17/11 Page1 of 6

1 GUIDO SAVERI (Bar No. 22349)  
     guido@saveri.com  
 2 R. ALEXANDER SAVERI (Bar No. 173102)  
     rick@saveri.com  
 3 CADIO ZIRPOLI (Bar No. 179108)  
     cadio@saveri.com  
 4 SAVERI & SAVERI, INC.  
     111 Pine Street, Suite 1700  
 5 San Francisco, California 94111  
     Telephone: (415) 217-6810  
 6 Facsimile: (415) 217-6913

7 *Interim Lead Counsel for the*  
 8 *Direct Purchaser Plaintiffs Class*

MARIO N. ALIOTO (Bar No. 56433)  
     malieto@tatp.com  
 9 LAUREN C. RUSSELL (Bar No. 241151)  
     lauren russell@tatp.com  
 10 TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP  
 11 2280 Union Street  
     San Francisco, California 94123  
 12 Telephone: (415) 563-7200  
     Facsimile: (415) 346-0679

13 *Interim Lead Counsel for the*  
 14 *Indirect Purchaser Plaintiffs Class*

15 James L. McGinnis (Bar No. 95788)  
     jmcginnis@sheppardmullin.com  
 16 SHEPPARD MULLIN RICHTER & HAMPTON LLP  
     Four Embarcadero Center, 17th Floor  
 17 San Francisco, California 94111  
     Telephone: (415) 434-9100  
 18 Facsimile: (415) 434-3947

19 *Defense Liaison Counsel*

20 **UNITED STATES DISTRICT COURT**

21 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

22  
 23 **IN RE: CATHODE RAY TUBE (CRT)**  
 24 **ANTITRUST LITIGATION**

MASTER FILE NO. 07-cv-5944 SC

MDL NO. 1917

25 **STIPULATION AND [PROPOSED]**  
 26 **ORDER**  
 27  
 28

827532.727532.5

07-CV-5944 SC

STIPULATION AND [PROPOSED] ORDER

PEARSON, SIMON, WARSHAW & PENNY, LLP  
 15166 VENTURA BOULEVARD, SUITE 400  
 SHERMAN OAKS, CALIFORNIA 91403

Case3:07-cv-05944-SC Document998 Filed06/29/11 Page7 of 11

Case3:07-cv-05944-SC Document952 Filed06/29/11 Page2 of 6

Case3:07-cv-05944-SC Document949 Filed06/17/11 Page2 of 5

PEARSON, SIMON, WARSHAW & PENNY, LLP  
15165 VENTURA BOULEVARD, SUITE 400  
SHERMAN OAKS, CALIFORNIA 91403

1 It is hereby stipulated by and between the Direct Purchaser Plaintiffs ("DPPs") and the  
2 Indirect Purchaser Plaintiffs ("IPPs") and the undersigned defendants ("Defendants") in this action  
3 as follows:

4 1. That all documents produced in the *In Re: TFT-LCD (Flat Panel) Antitrust -*  
5 *Litigation, Case No. M07-1827 SI ("In Re: TFT-LCD")* by entities, including their affiliates except  
6 for Toshiba Mobile Display Co., Ltd., that produced documents in *In Re: TFT-LCD* and are  
7 defendants in this action, can be reviewed by Plaintiffs' counsel in this action for the limited  
8 purpose of identifying documents for potential production in this action pursuant to the procedures  
9 described in Paragraphs 2 and 3 below. Such review will be subject to the protective order in *In*  
10 *Re: TFT-LCD* (Docket No. 241) as well as the protective order herein (Docket No. 306).

11 2. On or before September 1, 2011, Plaintiffs shall provide to all defendants a list of  
12 the foregoing documents from *In Re: TFT-LCD* that they seek to use in this action. The defendant  
13 that produced, or whose affiliate produced, a document in *In Re: TFT-LCD* so identified  
14 ("Producing Party") shall have 45 days to state objections to adding any such document to the  
15 CRT discovery record. Any document as to which no objections have been made shall be deemed  
16 produced herein. The parties shall meet and confer to resolve any objections made and, if  
17 necessary, discuss a process for seeking a ruling from the Special Master and the Court.

18 3. After this initial list is provided, Plaintiffs may supplement the list as necessary  
19 with additional documents covered by Paragraph 1 above to the extent that Plaintiffs were in good  
20 faith unable to finish their review of documents for inclusion in the list contemplated by Paragraph  
21 2 above. Plaintiffs shall provide notice to all defendants of any additions to the list of documents  
22 from the *TFT-LCD* action that they seek to use in this action, absent a showing of good cause, no  
23 later than seven calendar days before intended use in any deposition, submission or other  
24 proceeding, and no later than 30 days prior to the discovery cut off. Absent a showing of good  
25 cause, Plaintiffs may identify no more than ten additional documents in advance of each  
26 deposition. The Producing Party shall promptly state objections to adding any document  
27 identified by Plaintiffs to the CRT discovery record, if any, and the parties shall use the  
28 procedures agreed upon for resolution of disputes as stated in Paragraph 2 above. Any such

Case3:07-cv-05944-SC Document998 Filed06/29/11 Page3 of 11

Case3:07-cv-05944-SC Document952 Filed06/29/11 Page3 of 6

Case3:07-cv-05944-SC Document949 Filed06/17/11 Page3 of 6

1 resolution will be done on an expedited basis so as not to disrupt the taking of a noticed  
 2 deposition, or the continuance of any pre-trial dates.

3 4. All objections by Defendants with respect to relevancy and admissibility are  
 4 preserved as to any document from *In Re: TFT-LCD* that may be produced pursuant to the  
 5 foregoing procedures.

6 5. Absent Court order, this stipulation shall not apply to LG Display Co., Ltd. and LG  
 7 Display America, Inc. (collectively "LG Display"). Nothing in this stipulation shall preclude  
 8 Plaintiffs from seeking in this litigation the production of documents produced by LG Display in  
 9 *In Re: TFT-LCD*.

10 DATED: June 17, 2011

SAVERI & SAVERI, INC.  
 GUIDO SAVERI  
 R. ALEXANDER SAVERI  
 CADIO ZIRPOLI

11 By: /s/ Guido Saveri

GUIDO SAVERI  
 Interim Lead Counsel for the  
 Direct Purchaser Plaintiffs Class

12 DATED: June 17, 2011

TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP  
 MARIO N. ALIOTO

13 By: /s/ Mario N. Alioto

MARIO N. ALIOTO  
 Interim Lead Counsel for the  
 Indirect Purchaser Plaintiffs Class

14 DATED: June 17, 2011

MORGAN, LEWIS & BOCKIUS LLP  
 DIANE L. WEBB

15 By: /s/ Scott A. Stempel

SCOTT A. STEMPEL  
 Counsel for Defendants Hitachi, Ltd, Hitachi Asia,  
 Ltd, Hitachi America, Ltd, Hitachi Electronic Devices  
 (USA), Inc., and Hitachi Displays, Ltd.



Case3:07-cv-05944-SC Document998 Filed08/29/11 Page3 of 11

Case3:07-cv-05944-SC Document952 Filed06/29/11 Page4 of 6  
Case3:07-cv-05944-SC Document949 Filed06/17/11 Page4 of 6

1 DATED: June 17, 2011

ARNOLD & PORTER LLP  
ERIC SHAPLAND

2

3

By: /s/ Eric Shapland

4

ERIC SHAPLAND

5

*Counsel for Defendants LG Electronics, Inc., LG Electronics USA, Inc. and LG Electronics Taiwan Taipei Co., Ltd.*

6

DATED: June 17, 2011

DEWEY & LEOEUF LLP  
JEFFREY L. KESSLER

7

8

9

By: /s/ Jeffrey L. Kessler

JEFFREY L. KESSLER

10

*Counsel for Defendants Panasonic Corporation of North America, MT Picture Display Co., Ltd. and Panasonic Corporation (f/k/a/ Matsushita Electric Industrial Co.)*

11

12

DATED: June 17, 2011

BAKER BOTTS L.L.P.  
JOSEPH OSTOYICH

13

14

15

By: /s/ Joseph Ostoyich

JOSEPH OSTOYICH

16

*Counsel for Defendants Koninklijke Philips Electronics N.V., Philips Electronics North America Corporation, Philips Electronica Industries (Taiwan), Ltd., and Philips da Amazonia Industria Electronica Ltda.*

17

18

DATED: June 17, 2011

SHEPPARD MULLIN RICHTER & HAMPTON  
LLP  
JAMES L. MCGINNIS

19

20

21

By: /s/ James L. McGinnis

JAMES L. MCGINNIS

22

23

*Defense Liason Counsel and Counsel for Defendants Samsung SDI America, Inc., Samsung SDI Co., Ltd., Samsung SDI (Malaysia) Sdn. Bhd., Samsung SDI Mexico S.A. de C.V., Samsung SDI Brasil Ltda., Shenzhen Samsung SDI Co. Ltd., and Tianjin Samsung SDI Co., Ltd.*

24

25

26

27

28

PEARSON, SEMON, WARSHAW & PENNY, LLP  
15185 VENTURA BOULEVARD, SUITE 400  
SHERMAN OAKS, CALIFORNIA 91403

Case3:07-cv-05944-SC Document998 Filed06/29/11 Page10 of 11

Case3:07-cv-05944-SC Document952 Filed06/29/11 Page5 of 6  
Case3:07-cv-05944-SC Document949 Filed06/17/11 Page5 of 6

1 DATED: June 17, 2011

O'MELVENY & MYERS, LLP  
IAN SIMMONS

By: /s/ Ian Simmons

IAN SIMMONS

*Counsel for Defendants Samsung Electronics Co., Ltd.  
and Samsung Electronics America, Inc.*

6 DATED: June 17, 2011

BAKER & MCKENZIE LLP  
PATRICK J. AHERN

By: /s/ Patrick J. Ahern

PATRICK J. AHERN

*Counsel for Defendant Tatung Company of America,  
Inc.*

11 DATED: June 17, 2011

WHITE & CASE LLP  
LUCIUS B. LAU

By: /s/ Lucius B. Lau

LUCIUS B. LAU

*Counsel for Defendants Toshiba Corporation, Toshiba  
America, Inc., Toshiba America Information Systems,  
Inc., Toshiba America Consumer Products, L.L.C., and  
Toshiba America Electronic Components, Inc.*

17 DATED: June 17, 2011

FRESHFIELDS BRUCKHAUS DERINGER US  
LLP  
TERRY CALVANI

By: /s/ Terry Calvani

TERRY CALVANI

*Counsel for Defendant Beijing Matsushita Color CRT  
Company, Ltd.*

PEARSON, SIMON, WARSHAW & PENNY, LLP  
16165 VENTURA BOULEVARD, SUITE 400  
SHERMAN OAKS, CALIFORNIA 91403

Case3:07-cv-05944-SC Document998 Filed08/29/11 Page11 of 11

Case3:07-cv-05944-SC Document952 Filed06/29/11 Page6 of 6  
Case3:07-cv-05944-SC Document949 Filed06/17/11 Page6 of 61 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

2 I, Lauren C. Russell, attest that concurrence in the filing of this document has been  
 3 obtained from all signatories. I declare under penalty of perjury under the laws of the United  
 4 States of America that the foregoing is true and correct. Executed this 17th day of June 2011, at  
 5 San Francisco, California.

6  
 7  
 8 /s/ Lauren C. Russell  
 9

10  
 11  
 12 **IT IS SO RECOMMENDED.**

13 DATED: June 20, 2011  
 14

15  
 16 Charles A. Legge  
 17 Hon. Charles A Legge  
 Special Master

18 **IT IS SO ORDERED UPON THE RECOMMENDATION OF THE SPECIAL MASTER.**

19 DATED: June 29, 2011  
 20

